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15	[Additional Counsel Appear on Signature Pages] UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NORTHERN CALIFORNIA OAKLAND DIVISION	
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20	IN RE: LENOVO ADWARE LITIGATION	Case No. 4:15-md-02624-HSG
21		STIPULATION AND ORDER TO CONTINUI
22	This Document Relates to All Cases	DEADLINE TO FILE MOTION FOR PRELIMINARY APPROVAL
23		
24		Judge: Hon. Haywood S. Gilliam, Jr.
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STIPULATION

WHEREAS, on March 28, 2018, Plaintiffs and Defendant Lenovo (together, "the Parties") completed an in-person settlement conference with Magistrate Judge Jacqueline Scott Corley;

WHEREAS, the Parties executed a Term Sheet to settle this case on April 27, 2018;

WHEREAS, on April 30, 2018, pursuant to the Parties' stipulation, Plaintiffs indicated that they intended to file their motion for preliminary approval of the settlement by May 25, 2018, and the Court vacated all previously-scheduled dates pursuant to the Parties' request;

WHEREAS, on May 23, 2018, the Court granted an extension to June 15, 2018 for Plaintiffs to file their motion for preliminary approval to allow the Parties additional time to complete the Stipulation of Settlement and related materials (Dkt. No. 226);

WHEREAS, the Parties have made substantial progress toward completing the Stipulation of Settlement and related materials;

WHEREAS, Lenovo and certain retailers possess and have agreed to provide contact information for most settlement class members, and the organization of this data is ongoing;

WHEREAS, one retailer, Amazon, upon receiving a subpoena for the relevant class member information, contacted Plaintiffs' counsel and, citing privacy concerns, expressed a preference to notify its affected customers itself, rather than have notice come from a settlement administrator;

WHEREAS, in compromise, Amazon and Plaintiffs' counsel are negotiating a program that will allow direct email notice from Amazon, with Amazon also providing customer contact information to the settlement administrator in a manner that addresses Amazon's privacy concerns;

WHEREAS, after a competitive bidding process, Plaintiffs recently selected a settlement administrator, and require additional time to work with that administrator to ensure that the proposed claims process will encourage maximum class member participation while also protecting the settlement fund from non-meritorious claims;

WHEREAS, the Parties agree that good cause therefore exists for Plaintiffs' deadline to file their motion for preliminary approval to be continued to July 11, 2018;

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ATTESTATION OF FILING

I, Elizabeth A. Kramer, hereby attest, pursuant to Northern District of California, Local Rule 5-1(i)(3) that concurrence to the filing of this document has been obtained from each signatory hereto.

/s/ Elizabeth A. Kramer

ORDER

Pursuant to the parties' Stipulation and for good cause shown, Plaintiffs' deadline to file their motion for preliminary approval will be July 11, 2018.

IT IS SO ORDERED.

Dated: <u>June 14, 2018</u>

Hon. Haywood S. Gilliam, Jr.

United States District Judge